

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**COMMONWEALTH OF PUERTO RICO,  
et al.,**

Defendants.

**CIVIL NO.: 12-cv-02039**

**MOTION REQUESTING BRIEF EXTENSION OF TIME**

**MAY IT PLEASE THE COURT:**

**COME NOW**, Codefendants Commonwealth of Puerto Rico and the Puerto Rico Police Bureau ("PRPB"), through the undersigned attorneys, and very respectfully state and pray:

1. On September 9, 2021, this Honorable Court issued Order at Docket 1846 stating the following:

The parties shall file by October 1<sup>st</sup> 2021 a Joint Informative Motion regarding the matter of the Terry Stops.

2. The Order was reflected in the Minutes of the September 9, 2021, public and status hearings. Docket 1846. The parties and the Honorable Court had a constructive and valuable discussion during the hearing about "Terry stops" (or "investigatory stops" as referenced herein) and PRPB's compliance with paragraphs 58 to 64 of the Agreement for the Sustainable Reform of the Puerto Rico Police Department (the "Agreement"). Docket 60.

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3. Following the September 9<sup>th</sup> hearings and the Order of the Court, PRPB had the opportunity to thoroughly review the requirements of the Agreement and its stance and perspective on investigatory stops. In addition, counsel for both the United States and the Commonwealth had the opportunity to virtually meet to have a frank and forthcoming discussion on the matter.

4. The parties had discussed specific language for a motion in compliance with the Court's Order and the United States had commented and after some editing agreed on the motion initially proposed by the Commonwealth. However, upon further internal discussions within the Commonwealth and PRPB, it was concluded in good faith that a brief extension of seven (7) days was necessary on co-defendants' side to finalize the review and evaluation process regarding the motion in compliance with order.

5. The Commonwealth represents to the Court that this motion was consulted with counsel for the United States, who did not object to its filing and to the extension requested.

**WHEREFORE**, Defendants Commonwealth of Puerto Rico and the Puerto Rico Police Bureau, respectfully request this Honorable Court to grant an extension of seven (7) days for the parties to comply with its September 9<sup>th</sup> Order at Docket 1846.

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY** that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

In San Juan, Puerto Rico, this 1<sup>st</sup> day of October, 2021.

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For Defendant COMMONWEALTH OF PUERTO RICO:

**CANCIO, NADAL & RIVERA, L.L.C.**

P.O. Box 364966  
San Juan, Puerto Rico 00936-4966  
403 Muñoz Rivera Avenue  
San Juan, Puerto Rico 00918  
Tel. (787) 767-9625

**S/ RAFAEL BARRETO-SOLÁ**

USDC PR: 211801

[rbarreto@cnr.law](mailto:rbarreto@cnr.law)

**S/ GABRIEL A. PEÑAGARÍCANO**

USDC PR: 212911

[gpenagaricano@me.com](mailto:gpenagaricano@me.com)